MICHIGAN DEPARTMENT OF COMMUNITY HEALTH

NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.

Edmund P. Kemp

Director, Program Policy Division
Bureau of Medicaid Policy and Actuarial Services

Project O507-LHD Comments April 25, 2005 Proposed Fifective Date: Proposed Effective Date:

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Policy Subject: Local Health Department Outreach Activities

Affected Programs: Medicaid

Distribution: Local Health Departments

Policy Summary: This formalizes the administrative outreach categories and activities that Local Health Departments (LHDs) can perform and claim a Medicaid administrative match. The policy will be formalized in the agreement language of the annual CPBC contract, and for FY 05, a contract amendment will be initiated. LHDs will claim these activities as a separate item on the Financial Status Reports (FSR) that are submitted to accounting.

Proposed Policy Draft

Michigan Department of Community Health Medical Services Administration

Distribution: Local Health Departments

Issued: XX/XX/05

Subject: Local Health Department Outreach Activities

Effective: July 1, 2005 (proposed)

Programs Affected: Medicaid

Local Health Departments, under agreement with the Michigan Department of Community Health (MDCH), will formalize the reporting of Medicaid outreach activities effective for dates of service on and after July 1, 2005. This bulletin describes the categories of outreach services that the Local Health Departments (LHDs) are expected to perform under the agreement.

NOTE: All outreach activities must be specific to the Medicaid program. In addition, activities that are part of a direct service are not claimable as an administrative service.

OUTREACH ACTIVITIES

LHDs are expected to perform outreach activities to potential and current Medicaid beneficiaries in the following categories:

Medicaid Outreach and Public Awareness

Activities that are to be performed include those associated with informing eligible or potentially eligible individuals about Medicaid covered benefits and how to access them. This includes providing information about Early and Periodic Screening, Diagnosis and Treatment (EPSDT) services or making referral for such services. This category of outreach also includes coordinating and presenting information about Medicaid through media resources, health fairs and other community forums.

Facilitating Medicaid Eligibility Determination

Activities in this category of Medicaid outreach are related to assisting potential Medicaid eligible individuals in applying for Medicaid benefits. This includes explaining eligibility rules and assisting with the completion of the Medicaid application. It also includes referring individuals to the Michigan Department of Human Services to make application for benefits.

Program Planning, Policy Development and Interagency Coordination Related to Medical Services

Under this category of outreach activities, the LHDs must work collaboratively with other agencies to assure the delivery of Medicaid-covered services. This includes tracking requests for referrals and coordinating services with the Medicaid Health Plans. Activities that include development of health programs and services targeted to the Medicaid population fall into this category.

Referral, Coordination, and Monitoring of Medicaid Services

Outreach activities in this category include development of program resources for program specific services at LHDs. Coordination of programs and services at the health department and/or other agencies, and monitoring delivery of Medicaid services within the health department and/or other agencies, are included. LHDs may provide information such as that for EPSDT services or making referrals for family planning services.

Medicaid-Specific Training on Outreach Eligibility and Services

Activities that fall into this category of outreach are those that focus on coordinating, conducting, or participating in training and seminars for staff or contractors regarding general Medicaid information, the benefits of the program, and how to assist families in accessing Medicaid services. Outreach-related activities include training that enhances early identification, screening and referral of children and adolescents for EPSDT services. This category includes development and presentation of training modules regarding Medicaid eligibility and benefits to LHD staff.

Arranging for Medicaid-related Transportation and Provision of Medicaid-related Translation

Activities that fall into this category include activities to assist an individual to obtain transportation for Medicaid services. This includes scheduling or arranging transportation. It does **NOT** include activities that contribute to the actual billing of transportation as a medical service, nor does it include accompanying the Medicaid-eligible individual to Medicaid services as an administrative activity.

Translation activities are allowed when LHD staff provide translation services related to a Medicaid-covered service. Translation may be allowable if it is not included and paid for as part of a medical assistance service. This includes arranging translation services that assist an individual to understand necessary care and treatment and/or assist family members to understand how to provide necessary medical support and care to an individual.

Refer to Allowable Activity Categories (attached) for a complete description of allowable Medicaid activity categories.

BILLING AND REIMBURSEMENT

Grant Agreement

MDCH will work with LHDs to add a provision to the fiscal year Comprehensive Planning, Budgeting and Contracting (CPBC) Grant Agreement between the LHDs and MDCH identifying this administrative policy and describing the expectations for reporting and billing for these Medicaid Outreach Activities.

In FY04/05, the CPBC Grant Agreement will be amended to include the new Medicaid Outreach Activities provision. In subsequent years, this provision will be part of the standard CPBC Grant Agreement language.

Billing

The LHDs will bill for these outreach activities on a quarterly basis in a single column on a Financial Status Report (FSR). The column should be titled Medicaid Outreach Activities. The FSR should be part of the LHDs quarterly CPBC FSR submission to MDCH. MDCH will aggregate all of the quarterly amounts billed for LHD Medicaid outreach activities and will submit a claim for the federal portion of the costs. MDCH will reimburse the LHDs after MDCH receives the reimbursement of the federal claim.

These Medicaid Administrative Outreach Activities are claimed at the 50% administrative match rate.

Cost Allocation Plans

The LHDs need to add the Medicaid Outreach Activities to their existing cost allocation plans in accordance with OMB Circular A-87. MDCH will require the LHDs to certify that their existing cost allocation plan is in compliance with A-87 and that the plan identifies Medicaid Outreach Activities as a specific element of the plan. The certification will be accepted by MDCH as documentation to continue this administrative claiming. Each cost allocation plan will be subject to MDCH review for compliance with A-87.

Certifications

The LHD Cost Allocation Plan certifications are due June 30, 2005 and should be submitted to:

Michigan Department of Community Health Budget and Contracts Division Contract Management Section 320 S. Walnut St. Lansing, MI 48913

New certifications will be required if a modification occurs in the LHD's cost allocation plan that impacts the Medicaid Outreach Activities element or upon a Department review that results in a finding of non-compliance. If neither of these conditions exist, the certification remains valid in subsequent fiscal years.

ALLOWABLE ACTIVITY CATEGORIES

MEDICAID OUTREACH AND PUBLIC AWARENESS

Activity Category Description

This category is when staff performs activities that inform eligible or potentially eligible individuals about Medicaid and how to access Medicaid programs. This category is also used for describing the services covered under Medicaid and how to obtain Medicaid preventive services.

It includes related paperwork, clerical activities, or staff travel required to perform these activities:

- Informing families and distributing literature about the services and availability of the Early Periodic Screening, Diagnosis and Treatment (EPSDT) program and the many different Michigan Medicaid programs, such as Healthy Kids and Children's Special Health Care Services.
- Informing and encouraging families to access Medicaid managed care systems, i.e., Medicaid Health Plans.
- Informing families about the EPSDT and Medicaid health-related programs and the value of preventive health services and periodic exams.
- Assisting the Medicaid agency to fulfill outreach objectives of the Medicaid program by informing individuals and their families about health resources available through the Medicaid Program.
- Conducting Medicaid outreach campaigns and activities (such as health fairs) that provide information about services provided by such entities as the Community Mental Health Services providers, Medicaid Health Plans, Local Health Departments, etc.
- Conducting a family planning health education outreach program or campaign, if it is targeted specifically to Medicaid-covered family planning services.
- Contacting pregnant and parenting women about the availability of Medicaid services, including referral to family planning and well baby care programs and services.
- Providing referral assistance to families with information about the Medicaid program.
- Providing information about Medicaid screenings that will help improve the identification of medical conditions that can be corrected or ameliorated through Medicaid services.
- Notifying families of EPSDT program initiatives, such as Medicaid screenings.
- Coordinating with the local media (newspaper, TV, radio, video) to inform the public about EPSDT screenings, health fairs and other health related services, programs and activities organized by the LHD.
- Coordinating or attending health fairs that emphasize preventive health care, and promoting Medicaid services by presenting Medicaid material in locations with the likelihood of high Medicaid eligibility.
- Presenting and informing families about the availability of Medicaid providers of specific covered services, and how to effectively utilize services and maintain participation in the Medicaid program.

Supplemental Description of Activity

This category includes activities staff or contractors perform to inform families, parents and community members about the Medicaid Program, Medicaid covered services, how to obtain Medicaid preventive services, as well as assisting an individual or family in becoming eligible for Medicaid.

Some examples of these activities could be explaining the Medicaid program to families, giving a family a Medicaid application form, helping an individual complete a Medicaid application form, making a referral to a local or county Michigan Department of Human Services office, or helping someone gather and collect documentation to support a Medicaid application.

These outreach and application assistance activities are allowable ONLY with respect to Medicaid and Medicaid-covered services.

ALLOWABLE ACTIVITY CATEGORIES

FACILITATING MEDICAID ELIGIBILITY DETERMINATION

Activity Category Description

This category is for assisting an individual to become eligible for Medicaid. This category does not include the actual determination of Medicaid eligibility.

It includes paperwork, clerical activities, or staff travel required to perform these activities:

- Verifying an individual's current Medicaid eligibility status.
- Facilitating eligibility determination for Medicaid by planning and implementing a Medicaid information program.
- Participating as a provider of Medicaid eligibility outreach information.
- Explaining Medicaid eligibility rules and the Medicaid eligibility process to prospective applicants.
- Referring an individual or family to the local Michigan Department of Human Services or other local office to make application for Medicaid benefits.
- Assisting individuals or families to complete the Michigan Medicaid eligibility application.
- Assisting the individual or family in collecting/gathering information related to the application and eligibility determination for an individual, including resource information and third party liability (TPL) information, as a prelude to submitting a formal Medicaid application.
- Providing necessary forms and packaging all forms in preparation for the Medicaid eligibility determination.
- Referring families to appropriate sources to obtain Medicaid applications.

Supplemental Description of Activity

This category includes activities staff perform to inform individuals, families, parents and community members about the Medicaid Program, Medicaid covered services, how to obtain Medicaid preventive services, as well as assisting an individual or family in becoming eligible for Medicaid.

Some examples of these activities include explaining the Medicaid program to families or individuals visiting the LHD for other services, giving a family a Medicaid application form, helping an individual complete a Medicaid application form, making a referral to a local or county Michigan Department of Human Services office, or helping someone gather and collect documentation to support a Medicaid application.

These outreach and application assistance activities are allowable ONLY with respect to Medicaid and Medicaid-covered services.

PROGRAM PLANNING, POLICY DEVELOPMENT, AND INTERAGENCY COORDINATION RELATED TO MEDICAL SERVICES

Activity Category Description

This category is used for performing activities associated with the collaborative development of programs with other agencies that assure the delivery of Medicaid-covered medical/dental/mental health services to Medicaid beneficiaries. It applies only to employees whose position descriptions include program planning, policy development and interagency coordination, and/or those staff specifically appointed to appropriate committees/programs performing required activities.

It includes related paperwork, clerical activities or staff travel required to perform these activities:

- Defining the scope of each agency's Medicaid services in relation to the other, and identifying gaps or duplication of medical/dental/mental health programs.
- Analyzing Medicaid data related to a specific program, population, or geographic area and working with Medicaid resources, such as the Medicaid Health Plans, to locate and develop EPSDT health services referral relationships to populations of need.

Supplemental Description of Activity

This category includes activities staff performs in collaboration with agencies or organizations outside of the LHD to assure the delivery of Medicaid covered medical/dental/mental health services to Medicaid beneficiaries.

The focus of these activities is to enhance, improve or streamline health care service delivery systems in the community.

In order to perform these activities, staff may be representing the LHD by sitting on a committee or task force such as a Multi-Purpose Collaborative Body.

ALLOWABLE ACTIVITY CATEGORIES

- Creating a collaborative of health professionals to provide consultation and advice on the delivery of health care services to the Medicaid population and developing methods to improve the referral and service delivery process by Medicaid health providers.
- Containing Medicaid costs by reducing overlap and duplication of Medicaid services through collaborative efforts with Medicaid Health Plans, local Community Mental Health Services providers and Local Health Departments.
- Monitoring and evaluating policies and criteria for performance standards of medical/dental/mental health delivery systems in LHDs and designing strategies for improvements.
- Overseeing the organization and outcomes of the coordinated medical/mental health service provision with Medicaid Health Plans.
- Developing internal referral policies and procedures for use by staff so that appropriate coordination of health services occurs between the various Medicaid providers and entities, such as Community Mental Health Services providers, Medicaid Health Plans, and the respective LHDs.
- Designing and implementing strategies to: identify
 individuals who may be at high risk for poor outcomes
 because of poverty, dysfunctional families, and/or
 inappropriate referrals, and who need medical/mental
 health interventions; identify pregnant beneficiaries who
 may be at high risk of poor health outcomes because of
 drug usage, lack of appropriate prenatal care, and/or
 abuse or neglect; and assuring individuals with any
 significant health problems are diagnosed and treated
 early.
- Presenting specific provider information about Medicaid EPSDT screening that will help identify medical conditions that can be corrected or ameliorated by services covered through Medicaid.
- Developing procedures for tracking and resolving families' requests for assistance with Medicaid services and providers. This does not include the actual tracking of requests for Medicaid services.
- Developing new health programs with local community health agencies for the Medicaid population, as determined by a needs assessment and geographic mapping.

SPECIAL NOTE: These activities relate to the program and not for a specific individual.

REFERRAL, COORDINATION AND MONITORING OF MEDICAID SERVICES

Activity Category Description

This category is for developing appropriate referral sources for program-specific services for LHDs and monitoring the delivery of Medicaid services within the health department. It also is used for coordinating programs and services at the LHD level.

It includes related paperwork, clerical activities or staff travel necessary to perform these activities:

 Making referrals for, and coordinating access to medical services covered by Medicaid.

Supplemental Description of Activity

HEALTH-RELATED REFERRAL ACTIVITIES

This category includes activities that LHD staff or contractors perform during the referral process for a potential health-related issue.

Examples of these activities include locating individuals with potential health-related needs.

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ALLOWABLE ACTIVITY CATEGORIES

- Identifying and referring individuals who may be in need of Medicaid family planning services.
- Making referrals for and/or scheduling appropriate Medicaid-covered immunizations, vision and hearing testing, but not to include the child health screenings (vision, hearing and scoliosis) and immunizations that are required for all children.
- Providing information about Medicaid EPSDT screening (e.g., dental, vision, hearing) that will help identify medical conditions that can be corrected or improved by services through Medicaid.
- Contacting Medicaid providers of pediatric services in lower income areas to determine the scope of EPSDT screening and treatment services available.
- Reviewing clinical notes of staff by a designated clinician to identify medical referral and follow-up practices, and making recommendations to supervisors for improvements as needed.
- Conducting quality assurance reviews of specific Medicaid-related program objectives.
- Providing both oral and written instructions about the referral policies and procedures between the LHDs and other Medicaid provider entities for appropriate coordination of health services.
- Coordinating medical/mental health services with managed care plans as appropriate.
- Developing professional relationships for the purposes of referral of Medicaid-eligible individuals for EPSDT and other Medicaid related services.
- Developing strategies for containing medical costs and improving services to children as part of the goals of the EPSDT program.
- Working with agencies providing Medicaid services to improve the coordination and delivery of clinical health care services, to expand access to specific populations of Medicaid eligibles, and to improve collaboration around early identification of medical problems.
 Activities include development, implementation, and the amending of Interagency Agreements related to Medicaid services.

SPECIAL NOTE: Activities that are part of a direct service are not claimable as an administrative service.

This category also includes activities LHD staff perform in order to develop referral sources for the health department, such as a list or brochure of the physicians or HMOs in the area who accept Medicaid patients for evaluation or treatment, or a list of the other health agencies providing Medicaid services to whom families may be referred.

PROGRAMMATIC MONITORING AND COORDINATION OF MEDICAL SERVICES

This category includes activities that LHD staff or contractors perform to coordinate programs and services at the LHD. It also could include activities such as monitoring, or follow-up on the systematic delivery of health-related services within the health department.

This category includes program- or system-wide monitoring and coordination of services; it does NOT include beneficiary-specific activities such as individual service coordination or monitoring of services of a particular individual. These activities are often completed by a coordinator or supervisor of quality assurance activities or others with a broader scope related to health-related services provided within the health department.

MEDICAID-SPECIFIC TRAINING ON OUTREACH ELIGIBILITY AND SERVICES

Activity Category Description

This category is for coordinating, conducting, or participating in training events and seminars for staff who provide outreach services regarding the benefits of the Medicaid program, including how to assist families to access Medicaid services, and how to more effectively refer individuals for services.

It includes related paperwork, clerical activities or staff travel required to perform these activities:

 Participating in or coordinating training that improves the delivery of Medicaid services.

Supplemental Description of Activity

This category includes activities such as conducting or participating in training events and seminars for staff or contractors regarding general Medicaid information, including the benefits of the Medicaid program, how to assist families in accessing Medicaid eligibility and services, and how to more effectively refer individuals for services.

Allowable training activities must be associated in some way with connecting individuals and families to the Medicaid program or to Medicaid services.

ALLOWABLE ACTIVITY CATEGORIES

- Participating in or coordinating training that enhances early identification, intervention, screening and referral of children with health needs for EPSDT services.
- Coordinating training to assist families to access Medicaid services.
- Participating in or presenting training that improves the quality of identification, referral, treatment and care of children, e.g., talking to staff about the EPSDT referral process, available EPSDT and health-related services.
- Disseminating information on training sessions and conducting all related administrative tasks.
- Conducting seminars and presentations to staff related to Medicaid-covered services; providing information on where and how to seek assistance through the Medicaid program.
- Developing and preparing for others to utilize information about Medicaid-covered services, specific health standards and criteria associated with identification/detection of certain illnesses required by the Medicaid program.
- Developing, participating in, or presenting training that addresses the clinical importance of pediatric or other clinical standards for preventive care offered under the Medicaid program.

ARRANGING FOR MEDICAID-RELATED TRANSPORTATION AND PROVISION OF MEDICAID-RELATED TRANSLATION

Activity Category Description

This category is for assisting an individual to obtain transportation for Medicaid-covered services. This does not include the provision of the actual transportation service, but rather the administrative activities involved in providing transportation. This activity also does not include activities that contribute to the actual billing of transportation as a medical service, nor does it include accompanying the Medicaid-eligible individual to Medicaid services as an administrative activity.

This category is for LHD employees who provide translation services related to Medicaid-covered services as an activity. Translation may be allowable as an administrative activity if it is not included and paid for as part of a medical assistance service.

It includes related paperwork, clerical activities or staff travel required to perform these activities:

- Scheduling or arranging transportation for Medicaidcovered services.
- Assisting or arranging for transportation for the family in support of the referral and evaluation activities.
- Arranging for or providing translation services that assist the individual to access transportation and medical services.

Supplemental Description of Activity

This category includes activities staff perform in assisting an individual to obtain transportation in order to access Medicaid health-related services.

This category also includes the arranging for or providing of translation/interpretation services to enable an individual to access Medicaid health-related services.

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MICHIGAN DEPARTMENT OF COMMUNITY HEALTH

Local Health Department Administrative Outreach Program

ALLOWABLE ACTIVITY CATEGORIES

- Arranging for or providing translation services that assist the individual to "communicate" with service providers about medical services being provided.
- Arranging for or providing translation services that assist the individual to understand necessary care or treatment.
- Assisting the beneficiary to define/explain their symptoms to the physician.
- Arranging for or providing signing services that assist family members to understand how to provide necessary medical support and care to an individual.

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